

U.S. Department of Labor Occupational Safety and Health Administration
401 New Karner Road, Suite 300
Albany, NY 12205



01/17/2023

Amazon.com Services LLC, dba DY01
and its successors
500 Hudson Valley Avenue
New Windsor, NY 12553

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000-04R) revised 2018, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (518) 464-4338.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rita Young', with a stylized flourish at the end.

Rita Young, MS
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
401 New Karner Road, Suite 300
Albany, NY 12205



Citation and Notification of Penalty

To:

Amazon.com Services LLC, dba DYO1
and its successors
500 Hudson Valley Avenue
New Windsor, NY 12553

Inspection Number: 1607234**Inspection Date(s):** 07/18/2022 - 01/17/2023**Issuance Date:** 01/17/2023**Inspection Site:**

500 Hudson Valley Avenue
New Windsor, NY 12553

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (518) 464-4338. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the [pay.gov](http://www.pay.gov) homepage, type “OSHA” in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

Notification of Corrective Action – For each violation which you do not contest, you must provide ***abatement certification*** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that ***abatement documentation*** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an

employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 01/17/2023. The conference will be held by telephone or at the OSHA office located at 401 New Karner Road, Suite 300, Albany, NY 12205 on _____ at _____.

Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1607234

Company Name: Amazon.com Services LLC, dba DYO1
Inspection Site: 500 Hudson Valley Avenue, New Windsor, NY 12553
Issuance Date: 01/17/2023

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 401 New Karner Road, Suite 300, Albany, NY 12205.**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC, dba DYO1
Inspection Site: 500 Hudson Valley Avenue, New Windsor, NY 12553

Citation 2 Item 1 Type of Violation: **Serious**

Section 5(a)(1) of the Occupational Safety and Health Act of 1970: The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause serious physical harm to employees, in that employees were required to perform tasks resulting in stressors that had caused, were causing, or were likely to cause musculoskeletal disorders (MSDs):

- a. Amazon DYO1 Delivery Station, located at 500 Hudson Valley Avenue, New Windsor, NY: On or about July 18, 2022, and at times continuing thereafter, employees were exposed ergonomic hazards which were causing or likely to cause MSDs. During the Induct Feeder/Induct Belt Loader process path, employees were required to reach, twist, and bend, while repeatedly lifting packages from the bottom and the top of go-carts or Gaylords to the Induct belts at a high frequency, placing them at risk for lower back injuries.
- b. Amazon DYO1 Delivery Station, located at 500 Hudson Valley Avenue, New Windsor, NY: On or about July 18, 2022, and at times continuing thereafter, employees were exposed to ergonomic hazards which were causing or likely to cause MSDs. During the Stow/Container Building process path, employees were required to twist, bend, conduct long reaches and awkward postures while repeatedly lifting packages from racks, carrying or pushing them on a cart, and placing them on a stow shelf. The high frequency of lifts and height of stow shelves placed employees at risk for low back and shoulder injuries.

Among other methods, implementing a process-based approach with the following feasible and acceptable methods of abatement would eliminate or materially reduce the hazard:

1. Perform a worksite analysis to evaluate existing manual lifting and pulling hazards in the workplace and develop an effective ergonomics program. Conduct an ergonomic assessment by a certified professional ergonomist, or other qualified professional. An analysis should include an assessment with validated methods including, but not limited to, the Revised NIOSH lifting equation (RNLE), Rapid Entire Body Assessment (REBA), Rapid Upper Limb Assessment (RULA) or Snook tables and employee participation (e.g., questionnaires, interviews). Periodic ergonomic surveys of employees and process paths in the workplace should be conducted at appropriate intervals to evaluate effectiveness of controls.
2. Training and education for exposed employees, including methods to evaluate the effectiveness of the training. Re-training should be done annually, or as operations change. Training should be done in a manner understandable by all employees (in a language that they speak) and address hazards associated with the work they perform, early recognition of musculoskeletal injuries and illnesses, the ergonomic risk factors associated with their job(s), and

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC, dba DYO1
Inspection Site: 500 Hudson Valley Avenue, New Windsor, NY 12553

how to prevent MSDs. The training should include the elements of the ergonomics program and the affected employee's role in the program. Training should also be provided to operations area managers and process assistants as well as First Aid staff. A supervisors' training program should also be implemented to allow recognition of ergonomic risk factors, early signs of MSDs, and how to respond when risk factors are observed or when symptoms are reported. The training program should include the establishment's health care providers to ensure that they are able to recognize symptoms of MSDs and are familiar with appropriate protocols for treatment of MSDs. Educational material or training on ergonomics should be provided to people responsible for designing jobs and buying equipment, tools, workstations, and parts.

3. Hazard prevention and control which includes engineering, administrative, and work practice controls.

- a. Implement engineering controls that are designed by a qualified certified professional ergonomist or other qualified professional. Such controls may include workstation redesign, tool and handle redesign, and use of mechanical lifting aids.
- b. Implement administrative controls that reduce the duration, frequency, and severity of exposure to ergonomic risk factors. These controls may include job rotation, reduction of repetitions, multiple person lifts, and equipment maintenance.
- c. Implement work practice controls including work techniques, new employee conditioning, and reduction of weight lifted

The following engineering, administrative and work practice controls are feasible and will materially reduce the hazard at this workplace:

- a) Task/Process Path: Induct Feeder/Induct Belt Loader
 - Use a machine that dumps whole cart contents onto the conveyor belt to reduces reaching and torso bending and frequency of lifting.
 - Use carts with height adjustable platforms to reduce reach distance and torso bending.
 - Use pallet lifts that rotate to reduce torso bending and reaching distances. Consider pallet lifts that tilt when using Gaylords to reduce bending and reaching distances.
 - Reduce the employees' time on task via administrative methods such as job rotation during the shift or increased number of breaks.
- b) Task/Process Path: Stow/Container Building
 - Eliminate totes stored at floor height to reduce reaching, torso bending, kneeling, and awkward postures. Consider raising the shelves to knee height.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC, dba DYO1
Inspection Site: 500 Hudson Valley Avenue, New Windsor, NY 12553

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- Reduce the high frequency of the repetitive tasks such as bending, lifting and twisting by mechanization of part or the whole process.
 - Reduce the employees' time on task via administrative methods such as job rotation during the shift or increased number of breaks.

4. Medical management- Implement protocols developed and reviewed by physicians with training in occupational medicine, to include early recognition, evaluation, management of first aid cases, medical referral, and accurate recordkeeping of MSDs. Identify injury trends for action and include periodic evaluation of the medical management program. Ensure healthcare, including first aid, providers work within the scope of their license.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: October 06, 2023
Proposed Penalty: \$15,625.00

A handwritten signature in black ink, appearing to read "Rita Young".

Rita Young, MS
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
401 New Karner Road, Suite 300
Albany, NY 12205



INVOICE / DEBT COLLECTION NOTICE

Company Name: Amazon.com Services LLC, dba DYO1
Inspection Site: 500 Hudson Valley Avenue, New Windsor, NY 12553
Issuance Date: 01/17/2023

Summary of Penalties for Inspection Number: 1607234

Citation 2 Item 1, Serious \$15,625.00

TOTAL PROPOSED PENALTIES: **\$15,625.00**

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From the **OSHA Penalty Payment Form** search result, select Continue. The direct link is: <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

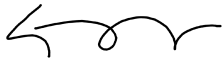
Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent

charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Rita Young, MS

Area Director

01/17/2023

Date

U.S. Department of Labor Occupational Safety and Health Administration
1851 Executive Center Drive
Suite 227
Jacksonville, FL 32207



01/17/2023

Amazon.com Services LLC-MCO2
and its successors
2600 N Normandy Blvd.
Deltona, FL 32725

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000-04R) revised 2018, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (904) 232-2895.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

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Sincerely,

David Tisdale
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
1851 Executive Center Drive
Suite 227
Jacksonville, FL 32207



Citation and Notification of Penalty

To:

Amazon.com Services LLC-MCO2
and its successors
2600 N Normandy Blvd.
Deltona, FL 32725

Inspection Number: 1608788**Inspection Date(s):** 07/18/2022 - 01/17/2023**Issuance Date:** 01/17/2023**Inspection Site:**

2600 N Normandy Blvd.
Deltona, FL 32725

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (904) 232-2895. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

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NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 01/17/2023. The conference will be held by telephone or at the OSHA office located at 1851 Executive Center Drive, Suite 227, Jacksonville, FL 32207 on _____ at _____.

Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1608788

Company Name: Amazon.com Services LLC-MCO2
Inspection Site: 2600 N Normandy Blvd., Deltona, FL 32725
Issuance Date: 01/17/2023

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 1851 Executive Center Drive, Suite 227, Jacksonville, FL 32207.**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

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By (Method of Abatement): _____

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Citation Number _____ and Item Number _____ was corrected on _____
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Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC-MCO2
Inspection Site: 2600 N Normandy Blvd., Deltona, FL 32725

Citation 2 Item 1 Type of Violation: **Serious**

Section 5(a)(1) of the Occupational Safety and Health Act of 1970: The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause serious physical harm to employees, in that employees were required to perform tasks resulting in stressors that had caused, were causing or were likely to cause musculoskeletal disorders (MSDs):

a. Amazon.com Services LLC-MCO2 located at 2600 Normandy Boulevard, Deltona, Florida: On or about July 18, 2022, and at times continuing thereafter, the employer's inbound employee(s) were exposed to an ergonomic hazard which was causing or likely to cause MSDs. Employees were required to perform lifting, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof, during the Inbound Fluid Unloading task placing them at risk for low back injuries.

b. Amazon.com Services LLC-MCO2 located at 2600 Normandy Boulevard, Deltona, Florida: On or about July 18, 2022, and at times continuing thereafter, the employer's inbound employee(s) were exposed to an ergonomic hazard which was causing or likely to cause MSDs. Employees were required to perform lifting, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof, during the Inbound Depalletize/Induct task placing them at risk for low back injuries.

c. Amazon.com Services LLC-MCO2 located at 2600 Normandy Boulevard, Deltona, Florida: On or about July 18, 2022, and at times continuing thereafter, the employer's outbound employee(s) were exposed to an ergonomic hazard which was causing or likely to cause MSDs. Employees were required to perform manual lifting, twisting, and carrying of packages while holding a scanner from conveyor belts to cages, go-carts, and pallets, at times, high vertical reaches or bending to place packages in the cages, go-carts or on pallets causes awkward body and hand positions during the Outbound Sorting task placing them at risk for a low back and upper extremity injuries.

d. Amazon.com Services LLC-MCO2 located at 2600 Normandy Boulevard, Deltona, Florida: On or about July 18, 2022, and at times continuing thereafter, the employer's outbound employee(s) were exposed to an ergonomic hazard which was causing or likely to cause MSDs. Employees were required to perform lifting, carrying, forceful exertions, twisting, bending, long reaches, awkward postures, and combinations thereof, during the Outbound Fluid Loading task placing them at risk for low back injuries.

WRITTEN ABATEMENT CERTIFICATION IS REQUIRED PURSUANT TO 29 CFR 1903.19

Among other methods, implementing a process-based approach with the following feasible and acceptable methods

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC-MCO2
Inspection Site: 2600 N Normandy Blvd., Deltona, FL 32725

of abatement would eliminate or materially reduce the hazard:

1. Worksite analysis to recognize and identify existing manual lifting hazards for all process paths in the workplace and develop an effective ergonomics program. Conduct an ergonomic assessment by a certified professional ergonomist, or other qualified professional. The analysis should include an assessment with validated methods [i.e., NIOSH lifting equation, the lumbar motion monitor, or other validated ergonomic risk assessment methods for lifting tasks. and employee participation (e.g., questionnaires, interviews). Periodic ergonomic surveys of employees and risk assessment of process paths in the workplace should be conducted at appropriate intervals to evaluate the effectiveness of controls.
2. Training and education including methods to evaluate the effectiveness of the training. Re-training should be done annually, or as operations change. Training should be done in a manner understandable by all employees (in a language that they speak) and address hazards associated with the work they perform, early recognition of musculoskeletal injuries and illnesses, the ergonomic risk factors associated with their job(s) of, and how to prevent MSDs. The training should include the elements of the ergonomics program and the affected employee's role in the program. Training should also be provided to operations area managers and process assistants as well as First Aid staff. A supervisors' training program should also be implemented to allow recognition of ergonomic risk factors, early signs of MSDs, and how to respond when risk factors are observed or when symptoms are reported. The training program should include the establishment's health care providers to ensure that they are able to recognize symptoms of MSDs and are familiar with appropriate protocols for treatment of MSDs. Educational material or training on ergonomics should be provided to people responsible for designing jobs and buying equipment, tools, workstations, and parts.
3. Hazard prevention and control which includes engineering, administrative, and work practice controls.
 - a. Engineering controls are designed by a qualified certified professional ergonomist or other qualified professional and may include workstation redesign, tool and handle redesign, and use of mechanical lifting aids. The goal should be to make the job fit the person.
 - b. Administrative controls are implemented which reduce the duration, frequency, and severity of exposure to ergonomic risk factors. These controls may include job rotation, reduction of repetitions, multi-person lifts, and maintenance of related equipment.
 - c. Work practice controls are implemented which include work techniques, new employee conditioning, and reduction of manually lifted package weight.

Examples of feasible engineering, administrative, and work practice controls applicable to this workplace include but are not limited to:

Process Path: Inbound Fluid Unloading

- All trailers received from Amazon facilities should be palletized, on carts or in shuttle containers. Work with

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC-MCO2
Inspection Site: 2600 N Normandy Blvd., Deltona, FL 32725

vendors whose trailers are not already palletized to get the load on the trailer palletized.

- Replace manual pallet jacks with electric pallet jacks to reduce employee over-exertion. Concurrent with this, implement a safe work practice program to ensure the safe operation of the electric pallet jack.

When trailers to be unloaded are not palletized:

- Implement the use of adjustable-height, powered conveyor systems and ensure that the conveyor is positioned inside the trailer close enough to the Amazon Associate (AA) to eliminate unnecessary carrying of packages while unloading. No more than one stride should be allowed from the lift origin (at the stack) to the lift destination (at the conveyor).
- Implement a robotic system to unload packages onto a powered conveyor.
- Implement procedures so that all inbound and outbound manual material handling of heavy parcels inside Amazon and Amazon contracted trailers are performed by a minimum of 2 AA working in unison.
- Safety training and best practice protocols when working in teams of 2 in trailers will facilitate parcel handling and help mitigate MSDs.
- Implement, and/or enforce a team lift protocol for heavy parcels. While there are written guidelines for team lifting of heavy parcels, they are not always practiced due to a lack of assistance.
- Utilize lifting assist technologies such as powered pallet jacks with clamping systems, powered pallet jacks with lift assists, and overhead, articulating lift assists.
- Reduce the frequency of lifts to safe levels as required by the Revised NIOSH Lifting Equation (RNLE).

Process Path: Depalletize/Induct

- Eliminate manual pallet unloading using fixed mechanical depalletizers or automated systems.
- Update the manual lift policy to reduce the maximum weight criteria for manual lifts. This change will increase the handling/movement of items by mechanical means.
- Provide lift -assists to reduce forward bending/ lifting from floor height and to minimize repeated lifting of items from pallet to station.
- Provide associate-controlled, adjustable-height workstations.

Process Path: Outbound Sort

- Implement a no-lift-from-floor policy.
- Engineering controls including portable carts to move parcels from one area to another and pallet lifts at the destination to eliminate lowering to below knee height.
- Electric pallet jacks that have clamp plates to lift and move heavy products from one area to another
- Institute electric pallet jacks to replace manual pallet jacks. Concurrent with this, implement a safe work practices program to avoid AA injuries from electric pallet jack use.
- Avoid stacking heavy parcels above 5th percentile female shoulder height (~48"). Carts should be marked to avoid stacking boxes above shoulder height (48").
- Implement lift assist to transfer packages from their origin (i.e., conveyor, pallet) to cages, or other pallets.
- Use a wearable scanner on the finger or hand or have wrap-around or machine vision bar code scanners at the

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC-MCO2
Inspection Site: 2600 N Normandy Blvd., Deltona, FL 32725

sloped surface of the workstation for products and at the workstation pointed at the location where the cart is stored.

Process Path: Outbound Fluid Loading

- All trailers shipped from Amazon facilities should be palletized, on carts or in shuttle containers.
- Reduce the height of pallets from 6' to 4' for loading and down stacking tasks - this will reduce potential exposure to low back and shoulder MSD injuries.
- Replace manual pallet jacks with electric pallet jacks to reduce employee over-exertion. Concurrent with this, implement a safe work practice program for the safe operation of the electric pallet jack.

When trailers to be loaded cannot be palletized, on carts or in a shuttle:

- Introduce powered conveyors that are at floor level that angle up to waist level, then parcels are staged by AA for Outbound Ship docks.
- Avoid stacking heavy packages above 5th percentile female shoulder height (~48") for the average size AA or on the floor.
- Implement a procedure for loading non-palletized trailers to ensure a minimum of 2 AA working in unison.
- Safety training and best practice protocols when loading trailers will facilitate safe and effective parcel handling and help mitigate MSDs.
- Implement protocols that require and enforce the practice of team lifting heavy parcels.
- Reduce the frequency of lifts to safe levels as required by the Revised NIOSH Lifting Equation (RNLE).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

May 30, 2023
\$15,625.00



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC-MCO2
Inspection Site: 2600 N Normandy Blvd., Deltona, FL 32725

Citation 2 Item 2 Type of Violation: **Serious**

29 CFR 1910.176(b): Material stored in tiers was not stacked, blocked, interlocked or limited in height so that it was stable and secure against sliding and collapse:

- a. Located at the Very Narrow Aisle (VNA) 307 and 308 in Amazon.com Services LLC-MCO2, Deltona, Florida: On or about August 3, 2022 and at times prior, the employer exposed employees to struck-by hazards in that merchandise was unevenly stacked and/or not secured to prevent them from collapsing/displacement.
- b. Located at Amazon.com Services LLC-MCO2, Deltona, Florida: On or about July 20, 2022 and at times prior: the employer exposed employees to struck-by hazards from falling merchandise while unloading trailers, in that merchandise was unevenly stacked and/or not secured to prevent them from collapsing/displacement.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	March 06, 2023
Proposed Penalty:	\$13,394.00

David Tisdale
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
1851 Executive Center Drive
Suite 227
Jacksonville, FL 32207



INVOICE / DEBT COLLECTION NOTICE

Company Name: Amazon.com Services LLC-MCO2
Inspection Site: 2600 N Normandy Blvd., Deltona, FL 32725
Issuance Date: 01/17/2023

Summary of Penalties for Inspection Number: 1608788

Citation 2 Item 1, Serious	\$15,625.00
Citation 2 Item 2, Serious	\$13,394.00

TOTAL PROPOSED PENALTIES: **\$29,019.00**

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From the **OSHA Penalty Payment Form** search result, select Continue. The direct link is: <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent

charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.

David Tisdale

Area Director

Date

U.S. Department of Labor Occupational Safety and Health Administration
2020 S. Arlington Heights Road
Suite 102
Arlington Heights, IL 60005



01/17/2023

Amazon.com Services LLC - MDW8
and its successors
1750 Bridge Dr.,
Waukegan, IL 60085

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000-04R) revised 2018, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (847) 227-1700.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,

A handwritten signature in black ink, appearing to read "Jacob Scott". The signature is written in a cursive, flowing style.

Jacob Scott
Acting Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
2020 S. Arlington Heights Road
Suite 102
Arlington Heights, IL 60005



Citation and Notification of Penalty

To:

Amazon.com Services LLC - MDW8
and its successors
1750 Bridge Dr,
Waukegan, IL 60085

Inspection Number: 1608898**Inspection Date(s):** 07/18/2022 - 01/17/2023**Issuance Date:** 01/17/2023**Inspection Site:**

1750 Bridge Dr,
Waukegan, IL 60085

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (847) 227-1700. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the [pay.gov](http://www.pay.gov) homepage, type “OSHA” in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

Notification of Corrective Action – For each violation which you do not contest, you must provide ***abatement certification*** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that ***abatement documentation*** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an

employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 01/17/2023. The conference will be held by telephone or at the OSHA office located at 2020 S. Arlington Heights Road, Suite 102, Arlington Heights, IL 60005 on _____ at _____ . Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1608898

Company Name: Amazon.com Services LLC - MDW8
Inspection Site: 1750 Bridge Dr., Waukegan, IL 60085
Issuance Date: 01/17/2023

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 2020 S. Arlington Heights Road, Suite 102, Arlington Heights, IL 60005.**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC - MDW8
Inspection Site: 1750 Bridge Dr., Waukegan, IL 60085

Citation 2 Item 1 Type of Violation: **Serious**

Section 5(a)(1) of the Occupational Safety and Health Act of 1970: The employer did not furnish employment and a place of employment which was free from recognized hazards that were causing or likely to cause death or serious physical harm to employees, in that employees were required to perform tasks resulting in stressors that had caused, were causing, or were likely to cause musculoskeletal disorders (MSDs):

a. Amazon.com Services LLC - MDW8 located at 1750 Bridge Drive in Waukegan, IL: On or about July 18, 2022, and at times continuing thereafter, the employer's employees were exposed to an ergonomic hazard which was causing or likely to cause MSDs. Employees were required to perform manual material handling lifting tasks, involving forceful exertions and awkward postures, repeatedly during the Inbound Receive Unload (Floor Unload) task placing them at risk for low back injuries.

b. Amazon.com Services LLC - MDW8 located at 1750 Bridge Drive in Waukegan, IL: On or about July 18, 2022, and at times continuing thereafter, the employer's employees were exposed to an ergonomic hazard which was causing or likely to cause MSDs. Employees were required to perform manual material handling lifting tasks, involving forceful exertions and awkward postures, repeatedly during the Outbound Ship Dock Sort (GE Sort) task placing them at risk for low back injuries.

c. Amazon.com Services LLC - MDW8 located at 1750 Bridge Drive in Waukegan, IL: On or about July 18, 2022, and at times continuing thereafter, the employer's employees were exposed to an ergonomic hazard which was causing or likely to cause MSDs. Employees were required to perform manual material handling lifting tasks, involving forceful exertions and awkward postures, repeatedly during the Outbound Ship Dock Sort (TV Sort) and Load (TV Load) tasks placing them at risk for low back injuries.

d. Amazon.com Services LLC - MDW8 located at 1750 Bridge Drive in Waukegan, IL: On or about July 18, 2022, and at times continuing thereafter, the employer's employees were exposed to an ergonomic hazard which was causing or likely to cause MSDs. Employees were required to perform manual material handling lifting tasks, involving forceful exertions and awkward postures, repeatedly during the during the Outbound Ship Dock Load (Floor Load) tasks placing them at risk for low back injuries.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC - MDW8
Inspection Site: 1750 Bridge Dr., Waukegan, IL 60085

Among other methods, implementing a process-based approach with the following feasible and acceptable methods of abatement would eliminate or materially reduce the hazard:

Engineering Controls to Reduce Ergonomic Risk Factors Associated with Increased Risk of Low Back Injury:

- 1) Utilize mechanical lifting and lifting assist technologies such as powered pallet jacks with clamping attachment systems and powered pallet jacks with lift assists to move individual packages from trailers and into trailers in the Inbound Receive Unload (Floor Unload) and Outbound Ship Dock Load (Floor Load) areas;
- 2) Utilize overhead, articulating lift assist technologies such as rail mounted lift assist devices and jib mounted lift assist devices at locations where pallet building and pallet downstacking activities occur in the Inbound Receive Unload (Floor Unload), Outbound Ship Dock Sort, and Outbound Ship Dock Load (Floor Load) areas;
- 3) Utilize height adjustable transfer technologies such as mobile height adjustable scissor lift carts, height adjustable pallet jacks, and height adjustable portable inclined (pivoting) belt conveyors (unloader/loader conveyors) to receive and unload individual packages in the Inbound Receive Unload (Floor Unload), Outbound Ship Dock Sort, and Outbound Ship Dock Load (Floor Load) areas, i.e. pallet downstacking and building tasks, at heights between knuckle and shoulder height;
- 4) Utilize portable or fixed conveying systems to transport individual packages at any points in the Inbound Dock and Outbound Ship Dock areas where individual movement is determined necessary; and
- 5) Utilize wearable scanner slings/holsters or hands-free scanning technologies to free up both hands of any worker performing an allowed manual material handling task.

Administrative Controls to Reduce Ergonomic Risk Factors Associated with Increased Risk of Low Back Injury:

- 1) Increase the number of individual packages handled by mechanical means in the Outbound Ship Dock area by significantly reducing the current weight criteria of 150 lbs. for use of Mechanical Lifts. Reorganize the Outbound Ship Dock area to increase the size of the Mechanical Lift Area to accommodate for an increase in the number of individual packages being handled by mechanical means (i.e., PITs);
- 2) Reorganize the Inbound Dock and Outbound Dock areas to allow for more room to perform material movements;
- 3) Work with outside vendors to increase the percentage of incoming trailers with pallet loaded trailers in the Inbound Receive area to reduce or eliminate the need for manual floor unloading of trailers. Consider developing an AMXL delivery standard/policy for vendors that requires or incentivizes the palletization of inbound loads with a goal of dramatically reducing or eliminating floor unloading of trailers.;

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Amazon.com Services LLC - MDW8
Inspection Site: 1750 Bridge Dr., Waukegan, IL 60085

- 4) Work with external customers and shipping partners to increase the percentage of pallet loaded trailers in the Outbound Ship Dock area;
- 5) Reorganize the Outbound Pick and Outbound Ship Dock Sortation processes to reduce the number of individual package touches, movements, and temporary storage phases in the Outbound Ship Dock Sortation process;
- 6) Reduce the weights allowed by policy to be manually lifted by workers in practice. Ensure that any allowed manual lifting tasks result in National Institute for Occupational Safety and Health (NIOSH) Revised NIOSH Lifting Equation (RNLE) Lifting Indexes (LIs) determined acceptable to materially reduce the risk of low back injury (validated). Overhaul the current manual lifting program/policy in place to ensure that any allowed manual lifting tasks (such as 1-person partially supported lifts, 2-person partially supported lifts, and 2-person team full lifts) performed in specific process paths are within acceptable limits per the NIOSH RNLE (i.e., validate any manual lifting). This would likely involve significantly reducing the maximum weight criterium for each of the current weight categories in the manual lifting program/policy and rethinking its widespread use in the facility. Any allowed manual pushing/pulling tasks should align with accepted manual push/pull design guidelines to be determined as safe and effective (i.e., validated). Any such policies should be rigorously monitored, evaluated, and enforcement by management. Any methods utilized to communicate policies (i.e., policy documents, weight labeling stickers, etc.) should be consistent, complete, and accurate.;
- 7) Reduce the allowable height of packages on pallets for any allowed (i.e., validated) manual downstacking and building tasks in the Inbound Dock and Outbound Ship Dock areas from the 6' allowable practice to the 4' policy currently in place in writing;
- 8) Add workers to any allowed (i.e., validated) manual material handling tasks to ensure that workers can effectively perform any multiple worker lifting actions (i.e., team lifts) without needing to take time off task or to incur other barriers to obtain assistance. Manual material handling work inside trailers in the Inbound Dock and Outbound Ship Dock areas should include mandatory two-person teams in the interim or under any limited situations where manual floor loading/unloading cannot be eliminated through portable lift assist technologies and/or through administrative means (such as policies, contracts, etc. with outside parties).; and
- 9) Reduce the duration (hours per shift) of manual material handling tasks by workers in the Inbound Dock and Outbound Ship Dock areas. Methods of reducing the duration of manual material handling tasks include: (1) adding workers to manual handling tasks to lessen the individual periods of allowed manual handling per worker, (2) adding significant rest periods/breaks between manual material handling task sessions, and (3) developing and implementing an employee rotation program that rotates workers between tasks that significantly reduces the amount and duration of manual material handling during a given shift.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



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Other Important Controls to Assist in the Reduction of Ergonomic Risk Factors Associated with Increased Risk of Low Back Injury:

1) Implement important elements of the written Amazon WHS Ergonomics Procedure NA (Ergonomics) Program found to be not implemented at this facility:

- a. Perform baseline ergonomic assessments for process paths using validated ergonomic assessment tools;
 - b. Follow-up baseline ergonomic assessments with the implementation of controls (in order of hierarchy of controls) for process paths determined to have unacceptable MSD risk based on the guidance of the assessment tools utilized;
 - c. Train workers on areas such as: (1) the principles of Amazon's Ergonomics Program, (2) general risk factors for MSDs, (3) common signs and symptoms associated with MSDs, (4) the importance of early reporting of MSD signs and symptoms and early intervention, (5) the ability to and the methods of requesting an individual ergonomic evaluation from the employer;
 - d. Engage workers in the ergonomics process by inclusion into the ergonomic risk identification and control process;
 - e. Implement management of change protocols for all proposed changes to the physical work environment or changes to work design of a task to ensure that changes do not introduce uncontrolled risk factors associated with MSDs; and
 - f. Implement program oversight and evaluation protocols to ensure that the site's written ergonomics program is being effectively implemented;
- 2) Develop a documentable MSD reporting program, beyond the current requirements of simply reporting later stage MSD injuries, to encourage workers to report early stage signs and symptoms of MSDs;
- 3) When performing incident investigations to determine root cause(s) of MSDs, investigate beyond immediate causes (i.e., worker behaviors, worker actions) to determine true root causes (i.e., any unmitigated ergonomic risk factors inherent in the process) for the injury;
- 4) Consider the impact of overtime and long shift durations (> 8 hours) on overall worker fatigue and revise work assignments accordingly;

5) Reduce overall fatigue and exertion experienced by workers in the Inbound Dock and Outbound Ship Dock areas

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associated with the movement of loaded pallets with manually powered pallet jacks by re-considering the reinstitution of electric pallet jacks (EPJs) where determined safe to implement; and

6) Implement medical management protocols developed and reviewed by physicians with training in occupational medicine, to include early recognition, evaluation, management of first aid cases, medical referral, and accurate recordkeeping of MSDs. Identify injury trends for action and include periodic evaluation of the medical management program. Ensure healthcare, including first aid providers work within the scope of their license.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence of abatement, or other written records.

Date By Which Violation Must be Abated:
Proposed Penalty:

May 30, 2023
\$15,625.00

A handwritten signature in black ink that reads "Jacob Scott".

Jacob Scott
Acting Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
2020 S. Arlington Heights Road
Suite 102
Arlington Heights, IL 60005



INVOICE / DEBT COLLECTION NOTICE

Company Name: Amazon.com Services LLC - MDW8
Inspection Site: 1750 Bridge Dr., Waukegan, IL 60085
Issuance Date: 01/17/2023

Summary of Penalties for Inspection Number: 1608898

Citation 2 Item 1, Serious

\$15,625.00

TOTAL PROPOSED PENALTIES:

\$15,625.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From the **OSHA Penalty Payment Form** search result, select Continue. The direct link is: <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational

Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Jacob Scott

Acting Area Director

01/17/2023

Date